

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 3390



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2018 JUN 18 AM 9:56

**SENSITIVE**

June 18, 2018

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *CW/H*  
Staff Director

FROM: Patricia C. Orrock *DC* for PCO  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *KDR BH*  
Kristin D. Roser/Ben Holly  
Reports Analysis Division  
Compliance Branch

SUBJECT: Withdrawal and Resubmission of Reason To Believe Recommendation –  
2018 April Quarterly Report for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on June 13, 2018 in order to reflect updates disclosed in recent filings received by the Commission, which would result in a lowered civil money penalty. After submission of the original RTB circulation, First State Strong FEC (AF 3385) filed the April Quarterly Report on June 14, 2018. The committee disclosed an actual level of activity which would result in a lowered civil money penalty than originally assessed. The committee disclosed total receipts and disbursements of \$4,006 (previously estimated to be \$734,166), thus the fine would be lowered from \$14,885 to \$333. The committee had not previously filed the report. The attached circulation chart reflects the updated information.

Attached is a list of political committees and their treasurers who failed to file the 2018 April Quarterly Report in accordance with 52 U.S.C. § 30104(a). The April Quarterly Report was due on April 15, 2018.

The committees listed on the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties

for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

#### **Recommendation**

- 1.
2. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
3. Send the appropriate letters.

6/18/2018 8:45 AM

**Federal Election Commission  
Reason to Believe Circulation Report  
2018 APRIL QUARTERLY Not Election Sensitive 04/15/2018 H\_S\_P\_UNAUTH**

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3374	C00612786	ADAM BELL POLITICAL CAMPAIGN	ADAM BELL	WILIAM LOUIS ZONA JR.	\$230,253	0		Not Filed	\$46,051 (est)	\$1,200
3375	C00823256	AMERICA COMES FIRST PAC		DAVID W. SCHAMENS	\$154,404	4		Not Filed	\$154,404 (est)	\$15,594
3376	C00319517	BLACKS IN GOVERNMENT POLITICAL ADVANCEMENT COUNCIL		JOE L. REED	\$667,682	0		Not Filed	\$222,560 (est)	\$9,214
3377	C00631382	BOLD CONSERVATIVES PAC		RYAN ZYNDA	\$4,552,207	0	5/8/2018	23	\$65,356	\$2,887
3378	C00663104	COMMITTEE TO ELECT HP	HAMID PARVIZIAN	DOUNIA METOURI	\$213,822	0		Not Filed	\$108,911 (est)	\$6,380
3379	C00663435	COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS	MAURO EVERETT GARZA	BERNARDINO RODRIGUEZ	\$229,563	0		Not Filed	\$114,782 (est)	\$6,380
3380	C00841332	COMMITTEE TO ELECT STEFANO DE STEFANO	STEFANO DE STEFANO	MARY BETH GUILBO	\$1,171,809	0		Not Filed	\$292,977 (est)	\$11,341
3381	C00656306	COPS AND KIDS TOGETHER		PAUL KUTAC	\$747,771	0	4/24/2018	9	\$716,775	\$7,508
3382	C00638767	CORI BUSH 2018	CORI BUSH	CORI BUSH	\$153,498	0	5/25/2018	40 (Not Filed*)	\$1,028	\$333
3383	C00610022	DOUGLAS HOWARD PIERCE FOR US SENATE	DOUGLAS HOWARD PIERCE	SYLVIA FOGELMAN	\$100,408	0	5/29/2018	44 (Not Filed*)	\$91,408	\$4,961
3384	C00834543	DR KATHIE ALLEN FOR CONGRESS	KATHRYN ALLEN	CHRISTOPHER STOUT	\$1,728,929	0		Not Filed	\$288,155 (est)	\$11,341
3385	C00632109	FIRST STATE STRONG FEC		MICHAEL FINNIGAN	\$1,472,338	0	5/14/2018	60 (Not Filed*)	\$4,008	\$333
3386	C00849079	HOLDEN 2018	DAVID HOLDEN	VIKI COEN	\$169,411	0	4/23/2018	8	\$103,118	\$2,274
3387	C00830772	KEATLEY FOR CHANGE	RICHARD KEATLEY	KEISHA A. CARTER	\$115,562	0	5/10/2018	25	\$28,232	\$958
3388	C00315713	LIBERTARIAN PARTY OF ILLINOIS		BRIAN W. DUNN	\$106,551	0	4/22/2018	7	\$61,934	\$1,175
3389	C00507699	NATIONAL INDEPENDENT AUTOMOBILE DEALERS ASSOCIATION PAC FUND		CHRIS G. MARTIN	\$328,567	0	4/27/2018	12	\$4,692	\$106
3390	C00636902	NY18VOTES		LINDA SAKAI	\$115,165	0	4/27/2018	12	\$25,509	\$607
3391	C00524355	PATRIOTS FOR ECONOMIC FREEDOM		ALEXANDER HORNADAY	\$160,718	0		Not Filed	\$40,180 (est)	\$1,200
3392	C00835045	POLITICAL JAB - JOSHUA A. BUTLER	JOSHUA A. BUTLER	JOSHUA BUTLER	\$110,781	0		Not Filed	\$22,158 (est)	\$667
3394	C00612846	THE DEMOCRATIC COALITION		FRANCESCA N. LUCIA	\$1,087,240	2	4/21/2018	6	\$94,470	\$2,128
3395	C00856215	TIM GOMES FOR CONGRESS	TIM GOMES	JENNIFER MAY	\$1,315,876	0		Not Filed	\$657,838 (est)	\$14,885
3396	C00649368	TIM RICH FOR CONGRESS	TIMOTHY A. RICH	TIMOTHY A. RICH	\$136,615	0	6/4/2018	50 (Not Filed*)	\$2,597	\$333

6/18/2018 8:45 AM

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3397	C00368415	U.A. PLUMBERS & STEAMFITTERS LOCAL NO. 22 P.A.C., INC.		SEAN P. REDDEN	\$146,482	0		Not Filed	\$73,241 (est)	\$3,828
3398	C00651307	WILLIAMS FOR WEST VIRGINIA	STEVE WILLIAMS	MARC E. WILLIAMS	\$160,461	0	4/24/2018	9	\$26,804	\$526

The committee filed their report more than thirty (30) days after the report due date; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Withdrawal and Resubmission of Reason )  
To Believe Recommendation - 2018 April )  
Quarterly Report for the Administrative )  
Fine Program: )  
ADAM BELL POLITICAL CAMPAIGN, ) AF# 3374  
and ZONA, LOUIS WILLIAM JR. as )  
treasurer; )  
AMERICA COMES FIRST PAC, and ) AF# 3375  
SCHAMENS, DAVID W MR. as treasurer; )  
BLACKS IN GOVERNMENT ) AF# 3376  
POLITICAL ADVANCEMENT )  
COUNCIL, and JOE L REED as treasurer; )  
BOLD CONSERVATIVES PAC, and ) AF# 3377  
ZYNDAL, RYAN as treasurer; )  
COMMITTEE TO ELECT HP, and ) AF# 3378  
METOURI, DOUNIA as treasurer; )  
COMMITTEE TO ELECT MAURO ) AF# 3379  
GARZA FOR US CONGRESS, and )  
RODRIGUEZ, BERNARDINO MR. as )  
treasurer; )  
COMMITTEE TO ELECT STEFANO DE ) AF# 3380  
STEFANO, and MARY BETH GUILBO as )  
treasurer; )  
COPS AND KIDS TOGETHER, and ) AF# 3381  
KUTAC, PAUL as treasurer; )  
CORI BUSH 2018, and BUSH, CORI as ) AF# 3382  
treasurer; )  
DOUGLAS HOWARD PIERCE FOR US ) AF# 3383  
SENATE, and SYLVIA FOGELMAN as )  
treasurer; )  
DR KATHIE ALLEN FOR CONGRESS, ) AF# 3384  
and STOUT, CHRISTOPHER as treasurer; )  
FIRST STATE STRONG FEC, and ) AF# 3385  
FINNIGAN, MICHAEL as treasurer; )  
HOLDEN 2018, and VIKI COEN as ) AF# 3386  
treasurer; )  
KEATLEY FOR CHANGE, and CARTER, ) AF# 3387  
KEISHA A MRS. as treasurer; )  
LIBERTARIAN PARTY OF ILLINOIS, ) AF# 3388  
and DUNN, BRIAN W. as treasurer; )

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission,  
do hereby certify that on June 20, 2018 the Commission took the following actions on  
the Withdrawal and Resubmission of Reason To Believe Recommendation - 2018  
April Quarterly Report for the Administrative Fine Program as recommended in the  
Reports Analysis Division's Memorandum dated June 18, 2018, on the following  
committees:

AF#3374 Decided by a vote of 4-0 to: (1) find reason to believe that ADAM BELL POLITICAL CAMPAIGN, and ZONA, LOUIS WILLIAM JR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3375 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3376 Decided by a vote of 4-0 to: (1) find reason to believe that BLACKS IN GOVERNMENT POLITICAL ADVANCEMENT COUNCIL, and JOE L REED in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3377 Decided by a vote of 4-0 to: (1) find reason to believe that BOLD CONSERVATIVES PAC, and ZYNDA, RYAN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3378 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT HP, and METOURI, DOUNIA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3379 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS, and RODRIGUEZ, BERNARDINO MR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3380 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT STEFANO DE STEFANO, and MARY BETH GUILBO in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.



AF#3381 Decided by a vote of 4-0 to: (1) find reason to believe that COPS AND KIDS TOGETHER, and KUTAC, PAUL in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3382 Decided by a vote of 4-0 to: (1) find reason to believe that CORI BUSH 2018, and BUSH, CORI in her as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3383 Decided by a vote of 4-0 to: (1) find reason to believe that DOUGLAS HOWARD PIERCE FOR US SENATE, and SYLVIA FOGELMAN in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3384 Decided by a vote of 4-0 to: (1) find reason to believe that DR KATHIE ALLEN FOR CONGRESS, and STOUT, CHRISTOPHER in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3385 Decided by a vote of 4-0 to: (1) find reason to believe that FIRST STATE STRONG FEC, and FINNIGAN, MICHAEL in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3386 Decided by a vote of 4-0 to: (1) find reason to believe that HOLDEN 2018, and VIKI COEN in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3387 Decided by a vote of 4-0 to: (1) find reason to believe that KEATLEY FOR CHANGE, and CARTER, KEISHA A MRS. in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3388 Decided by a vote of 4-0 to: (1) find reason to believe that LIBERTARIAN PARTY OF ILLINOIS, and DUNN, BRIAN W. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3389 Decided by a vote of 4-0 to: (1) find reason to believe that NATIONAL INDEPENDENT AUTOMOBILE DEALERS ASSOCIATION PAC FUND, and MARTIN, CHRIS G in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3390 Decided by a vote of 4-0 to: (1) find reason to believe that NY19VOTES, and SAKAI, LINDA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3391 Decided by a vote of 4-0 to: (1) find reason to believe that PATRIOTS FOR ECONOMIC FREEDOM, and HORNADAY, ALEXANDER in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3392 Decided by a vote of 4-0 to: (1) find reason to believe that POLITICAL JAB - JOSHUA A. BUTLER, and BUTLER, JOSHUA in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3394 Decided by a vote of 4-0 to: (1) find reason to believe that THE DEMOCRATIC COALITION, and LUCIA, FRANCESCA N in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3395 Decided by a vote of 4-0 to: (1) find reason to believe that TIM GOMES FOR CONGRESS, and MAY, JENNIFER in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

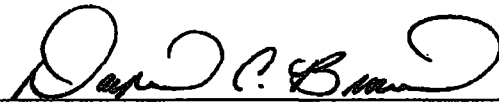
AF#3396 Decided by a vote of 4-0 to: (1) find reason to believe that TIM RICH FOR CONGRESS, and RICH, TIMOTHY A in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3397 Decided by a vote of 4-0 to: (1) find reason to believe that U.A. PLUMBERS & STEAMFITTERS LOCAL NO. 22 P.A.C., INC., and REDDEN, SEAN P. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3398 Decided by a vote of 4-0 to: (1) find reason to believe that WILLIAMS FOR WEST VIRGINIA, and WILLIAMS, MARC E. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 20, 2018  
Date

  
Dayna C. Brown  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 20, 2018

Linda Sakai, in official capacity as Treasurer  
NY19Votes  
974 Cow Hough Road  
New Paltz, NY 12561

C00636902  
AF#: 3390

Dear Ms. Sakai:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an April Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period January 1, 2018 through March 31, 2018, shall be filed no later than April 15, 2018. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on April 27, 2018, 12 days late.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On June 20, 2018, the FEC found that there is reason to believe ("RTB") that NY19Votes and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before April 15, 2018. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$607. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$607 is due within forty (40) days of the finding, or by July 30, 2018, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$25,509  
Number of Days Late: 12  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or July 30, 2018. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that NY19Votes and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

*Carole C. Hunter*

Caroline C. Hunter  
Chair

**PAYMENT AMOUNT DUE: \$607**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
2019 APR 16 AM 10:15

April 16, 2019

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP by MAA*  
Staff Director

FROM: Patricia C. Orröck *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *KDR BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2018 April Quarterly Report

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2018 April Quarterly Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, six (6) committees disclosed a level of activity after the RTB finding, which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Blacks In Government Political Advancement Council (AF 3376) filed the 2018 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result





### **RAD Recommendation**

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

14-00000-1

4/15/2019 9:00 PM

Federal Election Commission  
FD Circulation Report Fine Paid  
2018 APRIL QUARTERLY Not Election Sensitive 04/15/2018 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3381	COPS AND KIDS TOGETHER		C00656306	PAUL KUTAC	04/24/2018	9	\$718,775	0	06/20/2018	\$7,508	\$7,508	10/1/2018	\$7,518**
3382	CORI BUSH FOR CONGRESS	CORI BUSH	C00638787	CORI BUSH	05/25/2018	40 (Not Filed*)	\$27,425	0	06/20/2018	\$333	\$333	07/17/2018	\$333
3384	DR KATHIE ALLEN FOR CONGRESS	KATHRYN ALLEN	C00634543	KATHRYN ALLEN	11/16/2018	215 (Not Filed*)	\$8,164	0	06/20/2018	\$11,341	\$400	03/20/2019	\$400
3385	FIRST STATE STRONG FEC		C00632109	MICHAEL FINNIGAN	06/14/2018	60 (Not Filed*)	\$4,008	0	06/20/2018	\$333	\$333	07/31/2018	\$333
3386	HOLDEN 2018	DAVID HOLDEN	C00649079	VIKI COEN	04/23/2018	8	\$113,377	0	06/20/2018	\$2,274	\$2,274	07/10/2018	\$2,274
3388	LIBERTARIAN PARTY OF ILLINOIS		C00315713	BRIAN W. DUNN	04/22/2018	7	\$61,834	0	06/20/2018	\$1,175	\$1,175	07/23/2018	\$1,175
3389	NATIONAL INDEPENDENT AUTOMOBILE DEALERS ASSOCIATION PAC FUND		C00507689	CHRIS G. MARTIN	04/27/2018	12	\$4,682	0	06/20/2018	\$106	\$106	07/25/2018	\$106
3390	NY15VOTES		C00636902	LINDA SAKAI	04/27/2018	12	\$25,509	0	06/20/2018	\$607	\$607	08/27/2018	\$607
3398	WILLIAMS FOR WEST VIRGINIA	STEVE WILLIAMS	C00651307	MARC E WILLIAMS	04/24/2018	9	\$28,804	0	06/20/2018	\$526	\$526	11/26/2018	\$526

\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

\*\* The committee overpaid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

4/15/2018 4:58 PM

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2018 APRIL QUARTERLY Not Election Sensitive 04/15/2018 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3374	ADAM BELL POLITICAL CAMPAIGN	ADAM BELL	C00812796	LOUIS WILLIAM ZONA, JR.	07/11/2018	87 (Not Filed*)	\$185,346	0	08/20/2018	\$1,200	299	\$1,200
3375	AMERICA COMES FIRST PAC		C00823256	DAVID W. SCHAMENS		Not Filed	\$154,404 (est)	4	08/20/2018	\$15,594	299	\$15,594
3376	BLACKS IN GOVERNMENT POLITICAL ADVANCEMENT COUNCIL		C00319517	JOE L. REED	07/10/2018	86 (Not Filed*)	\$12,279	0	08/20/2018	\$9,214	299	\$987
3377	BOLD CONSERVATIVES PAC		C00631382	RYAN ZYNDA	05/08/2018	23	\$85,358	0	08/20/2018	\$2,887	299	\$2,887
3378	COMMITTEE TO ELECT HP	HAMID PARVIZIAN	C00883104	DOUNIA METOURI		Not Filed	\$108,911 (est)	0	08/20/2018	\$6,380	299	\$6,380
3379	COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS	MAURO EVERETT GARZA	C00683435	BERNARDINO RODRIGUEZ	07/16/2018	82 (Not Filed*)	\$35,272	0	08/20/2018	\$6,380	299	\$1,200
3380	COMMITTEE TO ELECT STEFANO DE STEFANO	STEFANO DE STEFANO	C00841332	MARY BETH GUILBO	08/01/2018	108 (Not Filed*)	\$18,740	0	08/20/2018	\$11,341	299	\$687
3383	FINANCE COMMITTEE FOR DOUGLAS HOWARD PIERCE	DOUGLAS HOWARD PIERCE	C00610022	DOUGLAS HOWARD PIERCE	05/29/2018	44 (Not Filed*)	\$91,408	0	08/20/2018	\$4,961	299	\$4,961
3387	KEATLEY FOR CHANGE	RICHARD KEATLEY	C00630772	KEISHA A. CARTER	05/10/2018	25	\$28,232	0	08/20/2018	\$956	299	\$956
3391	PATRIOTS FOR ECONOMIC FREEDOM		C00524355	ALEXANDER HORNADAY	07/15/2018	91 (Not Filed*)	\$329	0	08/20/2018	\$1,200	299	\$329
3392	POLITICAL JAB - JOSHUA A. BUTLER	JOSHUA A. BUTLER	C00835045	JOSHUA BUTLER	07/15/2018	91 (Not Filed*)	\$1,784	0	08/20/2018	\$687	299	\$333
3394	THE DEMOCRATIC COALITION		C00612848	OFFICE OF TREASURER	04/21/2018	6	\$94,470	2	08/20/2018	\$2,128	299	\$2,128
3395	TIM GOMES FOR CONGRESS	TIM GOMES	C00658215	JENNIFER MAY	07/11/2018	87 (Not Filed*)	\$1,114,885	0	08/20/2018	\$14,885	299	\$14,885
3398	TIM RICH FOR CONGRESS	TIMOTHY A. RICH	C00849368	TIMOTHY A. RICH	06/04/2018	50 (Not Filed*)	\$2,597	0	08/20/2018	\$333	299	\$333

\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program - Final )  
Determination Recommendation for the )  
2018 April Quarterly Report: )  
ADAM BELL POLITICAL CAMPAIGN, ) AF# 3374  
and ZONA, LOUIS WILLIAM JR. as )  
treasurer; )  
AMERICA COMES FIRST PAC, and ) AF# 3375  
SCHAMENS, DAVID W MR. as treasurer; )  
BLACKS IN GOVERNMENT ) AF# 3376  
POLITICAL ADVANCEMENT )  
COUNCIL, and JOE L REED as treasurer; )  
BOLD CONSERVATIVES PAC, and ) AF# 3377  
ZYNDA, RYAN as treasurer; )  
COMMITTEE TO ELECT HP, and ) AF# 3378  
METOURI, DOUNIA as treasurer; )  
COMMITTEE TO ELECT MAURO ) AF# 3379  
GARZA FOR US CONGRESS, and )  
RODRIGUEZ, BERNARDINO MR. as )  
treasurer; )  
COMMITTEE TO ELECT STEFANO DE ) AF# 3380  
STEFANO, and GUILBO, MARY BETH )  
as treasurer; )  
COPS AND KIDS TOGETHER, and ) AF# 3381  
KUTAC, PAUL as treasurer; )  
CORI BUSH FOR CONGRESS, and ) AF# 3382  
BUSH, CORI as treasurer; )  
FINANCE COMMITTEE FOR DOUGLAS ) AF# 3383  
HOWARD PIERCE, and DOUGLAS )  
HOWARD PIERCE as treasurer; )  
DR KATHIE ALLEN FOR CONGRESS, ) AF# 3384  
and ALLEN, KATHRYN DR. as treasurer; )  
FIRST STATE STRONG FEC, and ) AF# 3385  
FINNIGAN, MICHAEL as treasurer; )  
HOLDEN 2018, and COEN, VIKI as ) AF# 3386  
treasurer; )  
KEATLEY FOR CHANGE, and CARTER, ) AF# 3387  
KEISHA A MRS. as treasurer; )  
LIBERTARIAN PARTY OF ILLINOIS, ) AF# 3388  
and DUNN, BRIAN W. as treasurer; )

NATIONAL INDEPENDENT	)	AF# 3389
AUTOMOBILE DEALERS	)	
ASSOCIATION PAC FUND, and	)	
MARTIN, CHRIS G as treasurer;	)	
NY19VOTES, and SAKAI, LINDA as	)	AF# 3390
treasurer;	)	
PATRIOTS FOR ECONOMIC FREEDOM,	)	AF# 3391
and HORNADAY, ALEXANDER as	)	
treasurer;	)	
POLITICAL JAB - JOSHUA A. BUTLER,	)	AF# 3392
and BUTLER, JOSHUA as treasurer;	)	
TIM GOMES FOR CONGRESS, and	)	AF# 3395
MAY, JENNIFER as treasurer;	)	
TIM RICH FOR CONGRESS, and RICH,	)	AF# 3396
TIMOTHY A as treasurer;	)	
WILLIAMS FOR WEST VIRGINIA, and	)	AF# 3398
WILLIAMS, MARC E. as treasurer;	)	

## CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission,  
do hereby certify that on April 18, 2019 the Commission took the following actions  
on the Administrative Fine Program - Final Determination Recommendation for the  
2018 April Quarterly Report as recommended in the Reports Analysis Division's  
Memorandum dated April 16, 2019, on the following committees:

AF#3374 Decided by a vote of 4-0 to: (1) make a final determination that ADAM BELL POLITICAL CAMPAIGN, and ZONA, LOUIS WILLIAM JR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3375 Decided by a vote of 4-0 to: (1) make a final determination that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3376 Decided by a vote of 4-0 to: (1) make a final determination that BLACKS IN GOVERNMENT POLITICAL ADVANCEMENT COUNCIL, and JOE L REED in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3377 Decided by a vote of 4-0 to: (1) make a final determination that BOLD CONSERVATIVES PAC, and ZYNDA, RYAN in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3378 Decided by a vote of 4-0 to: (1) make a final determination that COMMITTEE TO ELECT HP, and METOURI, DOUNIA in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3379 Decided by a vote of 4-0 to: (1) make a final determination that COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS, and RODRIGUEZ, BERNARDINO MR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3380 Decided by a vote of 4-0 to: (1) make a final determination that COMMITTEE TO ELECT STEFANO DE STEFANO, and GUILBO, MARY BETH in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3381 Decided by a vote of 4-0 to: (1) make a final determination that COPS AND KIDS TOGETHER, and KUTAC, PAUL in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3382 Decided by a vote of 4-0 to: (1) make a final determination that CORI BUSH FOR CONGRESS, and BUSH, CORI in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3383 Decided by a vote of 4-0 to: (1) make a final determination that FINANCE COMMITTEE FOR DOUGLAS HOWARD PIERCE, and DOUGLAS HOWARD PIERCE in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3384 Decided by a vote of 4-0 to: (1) make a final determination that DR KATHIE ALLEN FOR CONGRESS, and ALLEN, KATHRYN DR. in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3385 Decided by a vote of 4-0 to: (1) make a final determination that FIRST STATE STRONG FEC, and FINNIGAN, MICHAEL in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3386 Decided by a vote of 4-0 to: (1) make a final determination that HOLDEN 2018, and COEN, VIKI in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3387 Decided by a vote of 4-0 to: (1) make a final determination that KEATLEY FOR CHANGE, and CARTER, KEISHA A MRS. in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3388 Decided by a vote of 4-0 to: (1) make a final determination that LIBERTARIAN PARTY OF ILLINOIS, and DUNN, BRIAN W. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3389 Decided by a vote of 4-0 to: (1) make a final determination that NATIONAL INDEPENDENT AUTOMOBILE DEALERS ASSOCIATION PAC FUND, and MARTIN, CHRIS G in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.



AF#3390 Decided by a vote of 4-0 to: (1) make a final determination that NY19VOTES, and SAKAI, LINDA in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3391 Decided by a vote of 4-0 to: (1) make a final determination that PATRIOTS FOR ECONOMIC FREEDOM, and HORNADAY, ALEXANDER in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3392 Decided by a vote of 4-0 to: (1) make a final determination that POLITICAL JAB - JOSHUA A. BUTLER, and BUTLER, JOSHUA in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

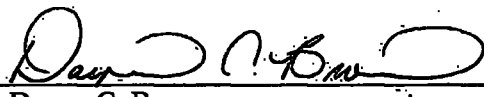
AF#3395 Decided by a vote of 4-0 to: (1) make a final determination that TIM GOMES FOR CONGRESS, and MAY, JENNIFER in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3396 Decided by a vote of 4-0 to: (1) make a final determination that TIM RICH FOR CONGRESS, and RICH, TIMOTHY A in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3398 Decided by a vote of 4-0 to: (1) make a final determination that WILLIAMS FOR WEST VIRGINIA, and WILLIAMS, MARC E. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

April 18, 2019  
Date

  
Dayna C. Brown  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 18, 2019

Linda Sakai, in official capacity as Treasurer  
NY19Votes  
974 Cow Hough Road  
New Paltz, NY 12561

C00636902  
AF#: 3390

Dear Ms. Sakai:

On June 20, 2018, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that NY19Votes and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2018 April Quarterly Report. By letter dated June 20, 2018, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$607 in accordance with the schedule of penalties at 11 CFR § 111.43.

On June 27, 2018, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on April 18, 2019 that NY19Votes and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$607 in accordance with 11 CFR § 111.43, and voted to close the file.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding this matter, please contact Ben Holly on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink that reads "Ellen L. Weintraub". The signature is written in a cursive, flowing style.

Ellen L. Weintraub  
Chair

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3390

100-22014